

## **EXHIBIT 52**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

AMAZON.COM, INC. and AMAZON  
DATA SERVICES, INC.,

Plaintiffs,

v.

WDC HOLDINGS LLC dba NORTHSTAR  
COMMERCIAL PARTNERS; BRIAN  
WATSON; STERLING NCP FF, LLC;  
MANASSAS NCP FF, LLC; NSIPI  
ADMINISTRATIVE MANAGER; NOVA  
WPC LLC; WHITE PEAKS CAPITAL LLC;  
VILLANOVA TRUST; JOHN DOES 1-20,

Defendants.

CASE NO. 1:20-CV-484

**DEFENDANTS' FOURTH SUPPLEMENTAL ANSWERS TO PLAINTIFFS' FIRST SET  
OF INTERROGATORIES**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, all applicable Local Rules, and in accordance with the Court's orders on July 17, 2020, July 22, 2020, November 13, 2020, and July 9, 2021, Defendants WDC Holdings LLC d/b/a Northstar Commercial Partners ("Northstar") and Brian Watson ("Mr. Watson") (collectively, "Defendants"), by through their undersigned counsel, serve their answers to Plaintiffs Amazon.com, Inc.'s and Amazon Data Services, Inc.'s (collectively, "Plaintiffs") Interrogatories.

Defendants hereby incorporate their privilege objections previously served concerning Plaintiffs' First Set of Interrogatories to Defendants WDC Holdings LLC and Brian Watson ("Objections") as if fully set forth herein.

**DEFENDANTS' OBJECTIONS AND ANSWERS TO PLAINTIFFS'  
INTERROGATORIES**

**INTERROGATORY NO. 2**

Describe in detail each transfer or other disposition of any assets or financial interests of any kind within YOUR possession, custody, or control that had an amount or estimate value of \$10,000 or more and occurred from April 2, 2020 through the present, including the amount, estimated amount or value, details of and reasons for the transfer or disposition, as well as the current or last known location of the asset(s) or interest(s).

**FOURTH SUPPLEMENTAL ANSWER:**

Subject to and without waiving their privilege objections, Defendants state that in addition to their previous answers to this Interrogatory, Defendants supplement their answer as follows regarding the sales of any assets since April of 2020:

The 800 Hoyt, LLC investors have and will receive substantially less money than they invested in the property. Defendants received \$52,628.12 from the sale of 800 Hoyt shortly after execution of a settlement agreement in March 2021. These funds were used to pay ordinary business and personal living expenses of Defendants. Defendant Brian Watson is also entitled to receive \$34,867 for a remaining personal debt guarantee fee, and WDC Holdings, LLC is to receive \$165,000 as a reduced disposition fee within three business days of 800 Hoyt's receipt of any portion of \$1 million currently held by a third party. The disposition fee shall be used for normal operating expenses of WDC Holdings, LLC, including payroll for its employees and repayment of loans, and the debt guarantee fee shall be used for the personal living expenses of Mr. Watson. Both Mr. Watson and WDC Holdings, LLC have suffered a severe reduction in income due to Plaintiff's allegations and have little funds available on which Mr. Watson may live and WDC Holdings, LLC can continue to operate as a company. Mr. Watson may also receive a distribution for his Limited Partner ("LP") equity investment in 800 Hoyt, LLC. Though the Manager has not communicated how much this may be, Mr. Watson's potential share is believed to be well less than \$50,000. Mr. Watson is required to distribute one-half of any distribution received for his LP equity investment interest to his ex-wife per the terms of their divorce agreement. Such receipt has not yet occurred but is anticipated to occur sometime later this month.

**VERIFICATION**

I, Brian Watson, affirmatively state, under penalty of perjury, that I have reviewed  
**DEFENDANTS' FOURTH SUPPLEMENTAL ANSWERS TO PLAINTIFFS' FIRST SET  
OF INTERROGATORIES** and, subject to stated objections, verify that the responses to the  
Interrogatories are true and correct to the best of my knowledge, information, and belief.

Dated 8<sup>th</sup> day of September, 2021.



---

Brian Watson

WDC HOLDINGS, LLC

**VERIFICATION**

I, Brian Watson, affirmatively state, under penalty of perjury, that I have reviewed  
**DEFENDANTS' FOURTH SUPPLEMENTAL ANSWERS TO PLAINTIFFS' FIRST SET  
OF INTERROGATORIES** and, subject to stated objections, verify that the responses to the  
Interrogatories are true and correct to the best of my knowledge, information, and belief.

Dated 8<sup>th</sup> day of September, 2021.



---

Brian Watson

Dated: September 8, 2021

By: s/ Stanley L. Garnett  
Stanley L. Garnett (pro hac vice)  
Amanda K. Houseal (pro hac vice)  
Brownstein Hyatt Farber Schreck, LLP  
Telephone: 303.223.1100  
Facsimile: 303.223.1111  
[sgarnett@bhfs.com](mailto:sgarnett@bhfs.com)  
[ahousel@bhfs.com](mailto:ahousel@bhfs.com)

Jeffrey R. Hamlin (VA Bar No. 46932)  
George R. Calhoun (pro hac vice)  
James Trusty (pro hac vice)  
IFRAH PLLC  
1717 Pennsylvania Avenue NW  
Suite 650  
Washington, DC 20006  
Telephone: 202.524.4140  
Facsimile: 202 524.4141  
[jhamlin@ifrahlaw.com](mailto:jhamlin@ifrahlaw.com)  
[geroge@ifrahlaw.com](mailto:geroge@ifrahlaw.com)  
[jtrusty@ifrahlaw.com](mailto:jtrusty@ifrahlaw.com)

Counsel for Defendants WDC Holdings,  
LLC and Brian Watson

**CERTIFICATE OF SERVICE**

I hereby certify that on September 8, 2021, I will email the foregoing document to the known attorney of record for each other party. For those parties for whom counsel is not known, a true and correct copy of the foregoing document shall be served by U.S. mail to their last known address.

Elizabeth P. Papez  
Patrick F. Stokes  
Claudia M. Barrett  
Michael Robert Dziuban  
GIBSON, DUNN & CRUTCHER LLP  
1050 Connecticut Avenue, N.W.  
Washington, D.C. 20036-5306  
[epapez@gibsondunn.com](mailto:epapez@gibsondunn.com)  
[pstokes@gibsondunn.com](mailto:pstokes@gibsondunn.com)  
[cbarrett@gibsondunn.com](mailto:cbarrett@gibsondunn.com)  
[mdziuban@gibsondunn.com](mailto:mdziuban@gibsondunn.com)  
Counsel for Plaintiffs Amazon.com, Inc.  
and Amazon Data Services, Inc.

Villanova Trust  
c/o Christian Kirschner, Trustee  
3924 Wallace Lane  
Nashville, TN 37215

AllCore Development LLC  
6870 W 52nd Avenue, Suite 203  
Arvada, CO 80002

Finbrit Holdings LLC  
6870 W 52nd Avenue, Suite 203  
Arvada, Colorado 80002

Casey Kirschner  
635 Alvarado Ln N  
Plymouth, MN 55447

Jamie Hubbard  
Stimson Stancil LaBranche Hubbard  
1652 Downing Street  
Denver, CO 80218  
Counsel for Defendants White Peaks  
Capital  
LLC and NOVA WPC LLC

By: *s/ Stanley L. Garnett*  
Stanley L. Garnett